

1 Sarah E. Piepmeier, Bar No. 227094
SPiepmeier@perkinscoie.com
2 Elise Edlin, Bar No. 293756
EEdlin@perkinscoie.com
3 PERKINS COIE LLP
505 Howard Street, Suite 1000
4 San Francisco, California 94105
Telephone: +1.415.344.7000
5 Facsimile: +1.415.344.7050

6 *Additional attorneys listed on signature page.*

7 *Attorneys for Defendant*
8 *NETFLIX, INC.*

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 OAKLAND DIVISION

12 LAURI VALJAKKA,
13 Plaintiff,
14 v.
15 NETFLIX, INC.,
16 Defendant.

Case No. 4:22-cv-01490-JST

DEFENDANT NETFLIX, INC.'S
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
SEALED [MOTION FOR AN ORDER TO
SHOW CAUSE AND SANCTIONS]

I. INTRODUCTION

Pursuant to Civil Local Rules 7-11 and 79-5, Defendant Netflix, Inc. (“Netflix”) hereby submits this administrative motion to consider whether material produced by non-party AiPi, LLC (“AiPi”) should be sealed. Netflix’s Motion for an Order to Show Cause and Sanctions and certain exhibits thereto include or describe documents that AiPi has produced to Netflix that are designated CONFIDENTIAL pursuant to the Stipulated Protective Order Regarding the Disclosure and Use of Discovery Materials (ECF No. 56) (“Protective Order”) (*see* Declaration of Elise Edlin in Support of Administrative Motion, filed herewith). Specifically, based on AiPi’s designations, Netflix seeks to seal:

Document	Entirety Or Redacted
Motion for Order to Show Cause and Sanctions	Highlighted Redactions: <ul style="list-style-type: none"> • 6:22-23; • 6:25-26; • 7:4; • 7:5; • 7:11-15; and • 7:27-28.
Exhibits J through O to the Edlin Declaration in Support of Motion for an Order to Show Cause and Sanctions.	Entirety

II. STATEMENT OF COMPLIANCE

Netflix has reviewed and complied with the Standing Order Governing Administrative Motions to File Materials Under Seal Before District Judge Jon S. Tigar. Defendant has also reviewed and complied with Civil Local Rule 79-5, including the requirement to file separate motions if a party seeks to file under seal a document containing “portions that more than one party bears the burden of showing is sealable.”

1 Dated: February 18, 2025

PERKINS COIE LLP

3 By: */s/ Elise Edlin*

Sarah E. Piepmeier, Bar No. 227094

4 Elise S. Edlin, Bar No. 293756

PERKINS COIE LLP

5 505 Howard Street, Suite 1000

6 San Francisco, California 94105

SPiepmeier@perkinscoie.com

7 EEdlin@perkinscoie.com

Telephone: +1.415.644.7000

8 Facsimile: +1.415.344.7050

9 Janice L. Ta (appearance *pro hac vice*)

PERKINS COIE LLP

10 405 Colorado Street, Suite 1700

11 Austin, Texas 78701

JTa@perkinscoie.com

12 Telephone: +1.737.256.6100

13 Facsimile: +1.737.256.6300

14 Adam Hester, Bar No. 311206

PERKINS COIE LLP

15 33 E. Main Street, Ste. 201

16 Madison, Wisconsin, 53703

AHester@perkinscoie.com

17 Telephone: +650.838.4311

18 Rachael D. Lamkin (SBN 246066)

19 Karan Singh Dhadialla (SBN 296313)

BAKER BOTTS L.L.P.

20 101 California Street, Suite 3200

San Francisco, CA 94111

21 Telephone: + 1.415. 291.6200

Facsimile: +1.415.291.6300

22 rachael.lamkin@bakerbotts.com

karan.dhadialla@bakerbotts.com

23 *Attorneys for Defendant*

24 **NETFLIX, INC.**

CERTIFICATE OF SERVICE

I, Kate Rose, declare:

I am a citizen of the United States and employed by the firm of Perkins Coie LLP in Santa Clara County, California. I am over the age of eighteen years and not a party to the within-entitled action. On February 18, 2025, I caused to be served this Motion, the supporting declaration of Elise Edlin, and a true copy of the sealed version of the following documents

- **[SEALED] NETFLIX’S MOTION FOR ORDER TO SHOW CAUSE AND SANCTIONS; and**
- **[SEALED] EXHIBITS J-O IN SUPPORT OF DECLARATION OF ELISE EDLIN IN SUPPORT OF NETFLIX’S MOTION FOR ORDER TO SHOW CAUSE AND SANCTIONS.**

upon William P. Ramey of Ramey LLP, and Brendan Klaproth, counsel for non-party AiPi, LLC, as listed below via electronic mail:

William P. Ramey, III
RAMEY LLP
5020 Montrose Blvd., Suite 800
Houston, Texas 77006
wramey@rameyfirm.com

Brendan J. Klaproth
Klaproth Law PLLC
2300 Wisconsin Ave NW, Suite 100A
Washington, DC 20007
BKlaproth@klaprothlaw.com

Plaintiff Valjakka, who is presently not represented by counsel, has been served copies of this Motion and the supporting declaration of Elise Edlin. Netflix is coordinating with counsel for AiPi to provide a copy of the sealed materials to Mr. Valjakka.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 18, 2025.

/s/ Kate Rose
Kate Rose